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ENVIRONMENTAL

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December 8, 2000

US EPA RECORDS CENTER REGION 5



450216

Matthew J. Dunn
Chief-Environmental Enforcement
Asbestos Litigation Division
Illinois Attorney General's Office
188 West Randolph Street, 20th Floor
Chicago, Illinois 60601

Marie Spicuzza
Cook County State's Attorney
69 West Washington
Chicago, Illinois 60602

Re: 1755 Glenview Road, Glenview, IL

Dear Mr. Dunn and Ms. Spicuzza:

For your information, enclosed are copies of the Packer Engineering Report relating to this customer and the self-explanatory cover letter from Nicor Gas' Director, Risk Management. If you have any questions, please let me know.

Sincerely,

John C. Berghoff, Jr.

JCB:jmr

enc.

cc: Russ Strobel
Dan McNamara



Nicor Gas
1844 Ferry Road
Naperville, IL 60563-8600

Mailing Address:
P.O. Box 190
Aurora, IL 60507-0190

Phone 830 883-8676
Internet www.nicor.com

December 4, 2000

**HAND DELIVERED BY COURIER WITH
COPY SENT VIA U.S. CERTIFIED MAIL**

Mr. Daniel Pontarelli
1757 Glenview Road
Glenview, Illinois 60025-2949

Subject: Mercury Source Investigation Results from 1755 Glenview Road, Glenview, Illinois

Dear Mr. Pontarelli:

Nicor Gas Company (Nicor) has completed its investigation regarding the mercury discovered at the commercial site referenced above on September 19, 2000. Based upon the results of this extensive investigation, Nicor has concluded that Nicor was not the source of the mercury discovered at the commercial site referenced above. Accordingly, Nicor will immediately cease all further clean-up and repair work and will not reimburse you for any future costs effective immediately. I enclose a copy of the Nicor mercury investigation report prepared by an independent engineering firm. A copy of this letter and the above referenced report is being provided to the Cook County States Attorney and the Illinois Attorney General.

Nicor reserves all rights it may have at law or in equity to avail itself of the right to recover damages in this matter. If you have any questions concerning this matter, please feel free to contact the undersigned or have your attorney contact our corporate counsel.

Very truly yours,

A handwritten signature in black ink, appearing to read "Rick T. Vycital".

Rick T. Vycital
Director, Risk Management

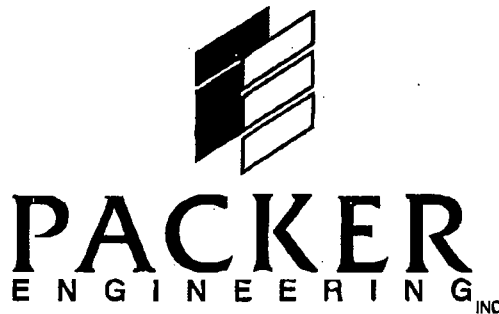
cc: Nancy Firfer, Mayor of Glenview
Carole R. Doris, Chief Deputy Attorney General
Matthew J. Dunn, Chief Environmental Division
Marie D. Spicuzza, Assistant States Attorney, Cook County



NICOR MERCURY INVESTIGATION

**Mercury Contamination of 1755 - 67 Glenview Road,
Glenview, Illinois**

SUBMITTED BY:



Submitted to:

**Shawn M. Collins, Esq.
The Collins Law Firm
1770 North Park Street
Suite 200
Naperville, IL 60563**

**Date of Report: November 17, 2000
Packer Engineering Project No. N26004**



INTRODUCTION

This report summarizes the results of an investigation conducted at the commercial site located at 1755-67 Glenview Road, Glenview, Illinois. Packer Engineering, Inc. was contacted by Shawn M. Collins of The Collins Law Firm on September 19, 2000. Mr. Collins requested that Packer Engineering determine, if possible, whether NICOR GAS was the source of the elemental mercury contamination discovered at the above address. It is our conclusion that NICOR GAS was not the source of the elemental mercury.

INVESTIGATION

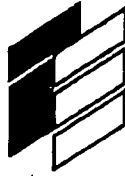
It was reported to Packer Engineering that, on September 19, 2000, while on a cold call to service one of the nine gas meters at the above address, a Nicor service crew noticed what appeared to be elemental mercury. Nicor sent out an inspection crew, including supervisor Michelle Aquino, with a Jerome Mercury Meter to investigate. Richard Bidwell of Packer Engineering, Inc. conducted a site inspection on the same day.

The site is a two-building commercial strip mall. Upon arrival at the site, it was reported to Packer Engineering that there were three locations with visible elemental mercury beads. Air monitoring with a Jerome Mercury Meter revealed mercury contamination in some of the businesses, which was most likely the result of tracking. Figure 1 shows the general layout of the two buildings (designated Building No. 1 and Building No. 2), the locations of the visible elemental mercury beads and the air sampling results reported by the Nicor inspection crew.

The single 3/4" high pressure gas service feed that provides gas service for the entire complex entered the strip mall at the back end (southern face) of Building No. 2. The gas service consisted of one vertical, dry seal regulator feeding four exterior meters for Building No. 2. Gas service for Building No. 1 is fed off the single gas regulator to a 2" low pressure line which feeds five additional exterior gas meters. It was reported to Packer Engineering that the 3/4" high pressure gas service main that runs north-south to Glenview Road under the asphalt drive was replaced on March 31, 1999. The regulator was not replaced when this new service main was installed; the existing regulator was connected to the new high pressure gas service main.

This installation did not have a current pin-off tee valve or show evidence of a past pin-off tee valve. No evidence of a gas meter or regulator service ever being located inside the building was visible at this location (e.g., absence of a vent pipe or a patched hole in the wall for a former vent pipe location).

The mercury bead samples were collected in three different locations. At the first location, marked as Sample Point No. 1 in Figure 1, elemental mercury was observed in an approximately 1 foot by 1 foot patch of soil (gravelly sand). The soil patch was deposited on the surface of the asphalt parking lot. No mercury could be seen beyond the soil patch. At the second location, marked as Sample Point No. 2 in Figure 1, beads of elemental mercury were spread along a 1½ foot radius around the floor drain located within Building No. 2 utility room. At the third location, marked as Sample Point No. 3 in Figure 1, very minute beads of elemental mercury were found mixed with saw dust within a 6 inch radius of the floor drain located in Building No. 1 utility room. Higher than ambient mercury readings were obtained from the contents of a shop-vac stored in Building No. 1 utility room.



The appearance of the mercury at Sample Points No. 1 and 2 was remarkable. In both locations, the mercury was present in beads as large as 1/4 inch diameter. The samples of mercury were collected only from the larger, easier to collect beads. Samples No. 1 and No. 2 were decanted in Packer Engineering's laboratory to remove the majority of the solid contaminants (soil, rocks and organic material). The total amount of mercury recovered in sampling was 65 grams (4.8 milliliters or approximately 1 teaspoon). Packer Engineering estimates that only 40% of the total amount of mercury was recovered during the sample collection. This estimate is based on a comparison of the amount collected to the total amount of mercury observed. This does not account for any mercury which could have entered the drains in either utility room or could have been collected by the shop vac. This represents an extremely large quantity of observed elemental mercury, in excess of 2.4 teaspoons by volume.

It was noted that the water piping and water meter had been recently reworked, which included the installation of a new section of concrete flooring. This was verified by the building owner/maintenance man who stated that the water piping and the floors in both east and west side utility rooms were renovated 1½ to 2 years ago. He also added that he found it very unusual that the elemental mercury was found at Sample Points No. 1 and 2 because he sweeps those areas on a regular basis. Due to the large size and number of mercury beads in the utility rooms, it is unlikely that they could have escaped the notice of the building owner. The sweeping action of a broom would have disturbed the mercury beads, creating smaller particle sizes and dispersing them throughout the rooms. The appearance of the mercury beads in the utility room of Building No. 2 is inconsistent with having been disturbed by sweeping. Thus, although these considerations do not provide a precise date for the release of the mercury beads onto the floors, it does strongly indicate a very recent release.

CONCLUSIONS

It is our opinion that NICOR GAS was not the source of the elemental mercury found at this address. There is no evidence that this site ever had a regulator or meter set in either of the buildings utility rooms. The dry seal regulator which is in use at the facility has been in service prior to the renovation of the floors in the utility rooms. These opinions are stated within a reasonable degree of engineering certainty.

Packer Engineering based these opinions on the information and observations available at the time of this report and reserves the right to modify or supplement these opinions should additional information become available.

Richard J.M. Bidwell
Staff Engineer
Chemical Engineering

Russell A. Ogle, Ph.D., P.E., C.S.P.
Vice President
Chemical Engineering

RJB:sls
Attachment

**ADDENDUM**

Packer Engineering was contacted by Chuck Corrigan of The Collins Law Firm on November 1, 2000 and requested to return to 1755-67 Glenview Road, Glenview, Illinois, to determine whether the metallic debris reportedly observed by the USEPA on the east building utility room floor was, in fact, elemental mercury.

Packer Engineering conducted a site inspection on November 2, 2000. Upon inspection of the east building utility room, Packer Engineering observed metal shavings (sawed and drilled sheet metal type) on the floor of the utility room. Also observed was solidified metal solder beads on the top of the hot water heater and some on the floor nearby. It was noted that the forced air furnace intake duct work had been recently replaced. In addition, portions of the copper piping supplying the hot water heater appeared to have been replaced subsequent to earlier Packer Engineering inspections. This is the same room in which visible mercury beads were identified during the previous (September 19, 2000) inspection. However, no visible mercury was observed during the present inspection.

At room temperature, solder is a solid and elemental mercury is a liquid. The observed metallic debris was solid in form. Therefore, Packer Engineering determined that the metallic debris observed by the USEPA at the above location was not elemental mercury.

Packer Engineering based these opinions on the information and observations available at the time of this report and reserves the right to modify or supplement these opinions should additional information become available.

Richard J.M. Bidwell
Staff Engineer
Chemical Engineering

Russell A. Ogle, Ph.D., P.E., C.S.P.
Vice President
Chemical Engineering

RJB:sls



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